

Timothy T. Pridmore; SBN: 00788224  
Todd J. Johnston; SBN: 24050837  
MCWHORTER, COBB & JOHNSON, LLP  
1722 Broadway (79401)  
P. O. Box 2547

Lubbock, Texas 79408

806/762-0214; 806/498-4808 (fax)

*Attorneys for Debtors/Defendants/Counter-Plaintiffs/Third-Party Plaintiffs/Third-Party Defendants 2B Farms, a Texas General Partnership, Terry M. Robinson, Rebecca A. Robinson and Non-Debtor, Angela Robinson*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

In re:

McClain Feed Yard, Inc., et al.,  
*Debtors.*

Case No. 23-20084-rlj7  
Jointly Administered

In re:

2B Farms, a Texas General  
Partnership, et al.,  
*Debtors.*

Case No. 23-500096-rlj12  
Jointly Administered

In re:

AgTexas Farm Credit Services, AgTexas PCA,  
Thorlakson Diamond T Feeders, LP,  
*Plaintiffs,*

and

Edward Dufurrena et. al.,  
*Intervenor-Plaintiffs,*

v.

Rabo AgriFinance, LLC, et al.,  
*Defendants.*

Adversary No. 24-02007-rlj  
Consolidated Adversary Proceeding

In re:

HTLF Bank, as successor to First Bank & Trust,

*Plaintiffs, Counter-Defendant and Cross-Claim Defendant,*

v.

2B Farms, a Texas General Partnership, Terry M. Robinson, and Rebecca A. Robinson,

*Defendants, Counterclaim-Plaintiffs, Third-Party Plaintiffs and Third-Party Counterclaim Defendants,*

v.

Rabo AgriFinance, LLC and Mechanics Bank,

*Third-Party Defendants and, as to Rabo AgriFinance LLC only, Third-Party Counterclaim Plaintiff and Cross-Claim Plaintiff.*

Adversary No. 24-02007-rlj  
Consolidate Adversary Proceeding

**2B FARMS, A TEXAS GENERAL PARTNERSHIP, TERRY M. ROBINSON AND REBECCA A. ROBINSON'S NOTICE OF FILING OF REDLINE OF THIRD AMENDED THIRD-PARTY AND CONSOLIDATED COMPLAINT (Dkt. No. 205 )**

TO THE HONORABLE JUDGE OF SAID COURT:

2B Farms, a Texas General Partnership, Terry M. Robinson and Rebecca A Robinson (collectively, “**2B Farms**”, “**Plaintiffs**” and/or “**Debtors**”) file this notice and would show unto the Court as follows.

1. On March 14, 2025, 2B Farms’ *Second Amended Third Party Complaint Also Amending and Consolidating Removed State Court Counterclaims Against HTLF Bank* (Dkt. 104) was filed in this adversary proceeding. On August 18, 2025, 2B Farms filed its *Third Amended Third-Party and Consolidated Complaint* (Dkt. No. 205).

2. Pursuant to this Court's request as stated at the July 17, 2025, hearing on the Trustee's Motion to Intervene, 2B Farms files as Exhibit "1" to this notice a redline of its *Third Amended Third-Party and Consolidated Complaint* (Dkt. No. 205)

Respectfully submitted,

**MCWHORTER, COBB & JOHNSON, L.L.P.**

1722 Broadway (79401)

P.O. Box 2547

Lubbock, Texas 79408

(806) 762-0214 - Telephone

(806) 498-4808 – Facsimile

Timothy T. Pridmore

SBN: 00788224

[tpridmore@mcjllp.com](mailto:tpridmore@mcjllp.com)

Todd J. Johnston

SBN: 24050837

[tjohnston@mcjllp.com](mailto:tjohnston@mcjllp.com)

By: /s/ Timothy T. Pridmore

Timothy T. Pridmore

***ATTORNEYS FOR DEFENDANTS, COUNTER-  
PLAINTIFFS, THIRD-PARTY PLAINTIFFS  
AND THIRD-PARTY DEFENDANTS 2B  
FARMS, A GENERAL TEXAS PARTNERSHIP,  
TERRY ROBINSON, REBECCA ROBINSON,  
AND ANGELA ROBINSON***

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2025, the foregoing document was filed with the Clerk of the Court in the foregoing case using the CM/ECF system, which sent notice of electronic filing to all electronic filing users in the case.

/s/ Timothy T. Pridmore

Timothy T. Pridmore